

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Karen Dieter,)	
)	
Plaintiff,)	Judge Kapala
)	
v.)	Case No. 07-06467
)	
Honeywell International Inc.)	
)	
Defendant.)	

**DEFENDANT’S AGREED MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, Honeywell International, Inc. (“Honeywell”), by and through its attorneys and pursuant to Rule 6 of the Federal Rules of Civil Procedure, and with the agreement of Plaintiff’s counsel, hereby move for an order granting it until and including, December 3, 2007, to answer or otherwise plead in this matter. In support hereof, Defendant states as follows:

1. Plaintiff served its Complaint, originally filed in the Circuit Court of the 15th Judicial Circuit, Stephenson County, on October 18, 2007.
2. On November 14, 2007, Defendant timely removed this matter to the Federal Court for the Northern District of Illinois, Western Division.¹ Thus, pursuant to Fed. R. Civ. Pro. 81(c)(2)(C), Defendant’s responsive pleading is currently due on November 21, 2007.
3. The Complaint alleges that Plaintiff was discharged in retaliation for the exercise of her worker’s compensation rights.

¹ Initially, this matter was assigned to Judge Norgle in the Eastern Division. On November 16, 2007, the Executive Committee transferred the case to this Court. *See* Docket Entry #6.

4. Defendant's counsel only recently received the complaint, and is currently in the process of gathering information and investigating the allegations of the Complaint. Additionally, due to employee vacations and the upcoming Thanksgiving holiday, Defendant's attorneys have been unable to sufficiently discuss the allegations of the Complaint with several key Company representatives.

5. Plaintiff's counsel, Rene Hernandez, Esq., has been contacted and apprised of Defendant's request for additional time, and has agreed to this requested extension.

6. This motion is made upon the grounds stated and not for the purpose of delay.

WHEREFORE, Defendant, Honeywell International, Inc., respectfully request that an Order be entered granting them until December 3, 2007 to answer or otherwise plead.

Respectfully submitted,

Honeywell International, Inc.

By: s/ Michael D. Ray
One of its Attorneys

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Michael D. Ray (ARDC No. 6285109)
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
20 S. Clark St., 25th Floor
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312-558-1220
Dated: November 19, 2007

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on November 19, 2007, he electronically filed the foregoing Agreed Motion for an Extension to Answer or Otherwise Plead. Notice of this filing will be sent via the Court's electronic filing system to:

Rene Hernandez, Esq.
Law Offices of Rene Hernandez, P.C.
Rockford, IL 61104
renesone@aol.com

Michael D. Ray

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